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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case No.
	§	
CARL KEITH BATTIE	§	
a.k.a. CARL HAMPTON	§	3-16CR-051-D

INFORMATION

The United States Attorney Charges:

Count One
Conspiracy to Commit Wire Fraud
(Violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343))

At all times material to this information:

1. Starting in or about May 2011, and continuing until at least March 2014, the exact dates being unknown to the U.S. Attorney, in the Northern District of Texas, and elsewhere, the defendant **Carl Keith Battie, a.k.a. Carl Hampton**, did unlawfully and knowingly combine, conspire, confederate, and agree with others, both known and unknown to the U.S. Attorney, including Person A, an individual known to the U.S. Attorney, to commit certain offenses against the United States, to wit, wire fraud, in violation of 18 U.S.C. § 1343.

2. The objective of the conspiracy was for **Battie** and Person A, among others, to unlawfully enrich themselves by defrauding investors in connection with the fraudulent sale and offer to sale of investments in real estate.

3. In furtherance of the scheme and artifice to defraud:

a. **Battie** operated several business entities out of offices in Dallas, Texas, within the Northern District of Texas, including Lien Exchange TX, LLC, Lien Exchange, Inc., Family First NV, LLC, Loving Life Studios, LLC, WCM Direct, Inc., and "Entrust."

b. **Battie** located and purchased distressed and dilapidated real estate primarily in the St. Louis, Missouri, area. **Battie**, using the various business entities along with other coconspirators, flipped the properties one or more times over the course of several months or years in order to create the appearance of a market and inflate the appraised value of the property.

c. **Battie** directed his associates to falsify signatures and notaries on property records that were later filed with the St. Louis County Clerk's office and the City of St. Louis Recorder of Deeds.

d. Person A, with **Battie's** knowledge and at his direction, pitched actual and potential investors the opportunity to invest in mortgage notes underlying the distressed and dilapidated real estate. Typically, Person A pitched senior citizens at investment seminars at high-end restaurants.

e. Person A, with **Battie's** knowledge and at his direction, made numerous factual and material misrepresentations about the value of the properties underlying the mortgage notes and the solvency of the company as well as omissions about the condition of the properties.

f. **Battie** caused Person A to send electronic communications via interstate wire transfer, that is, the transfer of **Battie's** cut of investor proceeds from the scheme and artifice to defraud.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343).

Notice of Forfeiture
(18 U.S.C. §§ 981(a)(1)(c) and 28 U.S.C. § 2461(c))

Upon conviction of the offense alleged in Count One this Information, defendant **Carl Keith Battie, a.k.a. Carl Hampton,** shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, whether directly or indirectly, including the total proceeds derived from the offense (commonly referred to as a "money judgment").

The property subject to forfeiture includes the following: (a) 2014 Subaru Forester vin JF2SJAHCXEH483050; (b) $15,292.00 in U.S. currency; (c) 1,500,000 Iraqi Dinar; (d) Men's Wittnauer watch; (e) Men's 18-karat gold Rolex Oyster Perpetual watch model 2940; (f) Men's 18-karat gold Rolex President watch model 18038; (g) Women's 10-karat white gold diamond ring with 15 princess cut diamonds; (h) 14-karat yellow gold diamond band with 13 round cut diamonds; (i) Men's 14-karat yellow gold diamond ring; (j) 18-karat gold Cartier Cougar watch with an alligator leather band; (k) $1,451.25 seized from account xx8102 at Wells Fargo Bank; (l) $65,336.47 seized from account xx8240 at Wells Fargo Bank; and (m) $15,273.92 seized from account xx7117 at U.S. Bank.

----- NOTHING FURTHER ON THIS PAGE -----

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), if any of the above property subject to forfeiture, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the above described property subject to forfeiture.

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